

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

SANDRA LEE,
Plaintiff,

v.

**RUBIN LUBLIN TN, PLLC, BANK OF
AMERICA, NA, MOONLIGHTER
ENTERPRISES, INC.,
DEFENDANTS.**

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No. 17-cv-0891
Improperly Removed from the
Circuit Court of Davidson County

Case No. 17C-1089

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO FILE BRIEF IN SUPPORT
OF MOTION TO REMAND CASE TO STATE COURT**

Plaintiff, Sandra Lee, by and through counsel, hereby files her Motion for Extension of time to file Brief in Support of Motion to Remand his case to Tennessee State Court. In support of this motion Ms. Lee would state as follows:

1. That the Defendants filed an improper Notice of Removal in state Court to bring this matter to federal court;
2. Despite the Defendants' wild claims, there is no diversity jurisdiction supporting removal to federal court;
3. Counsel is flying to Dallas, Texas in the morning and will not return under late Friday evening;
4. Counsel is not certain this motion is required, but in an abundance of caution, files the same.

Therefore Ms. Lee prays:

1. That the Court give Ms. Lee an additional ten (10) days to file her brief in support; and,
2. For whatever relief is equitable and just.

Respectfully submitted:

____/s/____ James D.R. Roberts, Jr.____
James D. R. Roberts, Jr. BPR#017537
Brian I. Long, BPR#032761
Creditor Law Center
1700 Hayes Street, Suite 303
Nashville, Tennessee 37203
(615) 242-2002 office
(615) 242-2042 facsimile
Attorneys for Sandra Lee

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the forgoing motion has been sent by ECF to:
and United States mail to:

Ms. Heather Wright
Mr. Brian Epling
Bradly Arrant Boulton Cummings
1600 Division Street, Suite 700
Nashville, Tennessee 37203-0025

H. Buckey Cole
HALL BOOTH SMITH P.C.
Fifth Third Center
424 Church Street, Suite 2950
Nashville, TN 37219

On this the 30th day of May, 2017.

____/s/____ James D. R. Roberts, Jr.____
JAMES D. R. ROBERTS, JR.